

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

YOLANDA CANDELARIO RAMOS, et al.;

Plaintiffs,

vs.

BAXTER HEALTHCARE CORPORATION OF
PUERTO RICO, INC., et al.;

Defendants.

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* CIVIL NO. 98-2146 (RLA)

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* JURY TRIAL REQUESTED

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**MOTION REQUESTING SHORT EXTENSION OF TIME TO
COMPLY WITH COURT ORDER**

TO THE HONORABLE COURT:

COME NOW THE PLAINTIFFS and through their undersigned attorneys,
respectfully allege, state and request as follows:

1. The Court recently ordered the plaintiffs to file their reply to defendants' motion for attorney fees (Docket #60) on or before 12/1/2004. (Docket #68)

2. Plaintiffs have made considerable efforts to complete their opposition to defendants' fee request, but due to ongoing deposition schedules¹, several court hearings and other pre-existing professional commitments, it has been impossible for plaintiffs' attorneys to present their opposition by today.

3. Plaintiffs estimate that they will require a short extension of five(5) working

¹ For example, undersigned counsel Hey-Maestre has had to attend nine (9) depositions in the last eleven (11) working days, all scheduled before this Court's order.

days in order be able to complete and file their opposition to defendants' attorneys fees request.

4. Upon information and belief, this short extension will not unduly burden the Court nor will it prejudice the defendants.

WHEREFORE, it is respectfully requested that the Court GRANT the plaintiffs a five (5) day extension of time, until December 8, 2004 to complete and file their opposition to defendants' attorneys fees request, and that it PROVIDE such other and further relief as it may deem necessary and proper.

IT IS HEREBY CERTIFIED that on this date the foregoing document was filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing electronically to **Pedro Manzano-Yates, Esq.**, Fiddler González & Rodríguez, P.O. Box 363507, San Juan, Puerto Rico 00936-3507 and via regular mail to **Christopher A. Weals, Esq.**, SEYFARTH, SHAW, FAIRWEATHER & GERALDSON, 815 Connecticut Ave., N.W. - Suite 500, Washington, D.C. 20006-4004.

Respectfully submitted in San Juan, Puerto Rico this 1st day of December, 2004.

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